

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

LORI COOK individually,

NO. 3:13-cv-05986

Plaintiff,

SPECIAL VERDICT FORM

VS.

HARRISON MEDICAL CENTER, a Washington nonprofit corporation,

Defendant.

On Plaintiff's first claim alleging retaliation in violation of the False Claims Act, 31 USC §3729 et al., answer the following questions:

1. Has the Plaintiff proven by a preponderance of the evidence that she was engaged in protected activity?

yes

_____no

If you checked YES to question 1 above, then answer Question No. 2. If you checked NO to question 1 above, you are not to answer further Questions.

2. Has the Plaintiff proven by a preponderance of the evidence that Defendant knew that she was engaged in protected activity?

YES

no

SPECIAL VERDICT FORM- 1

1 **If you checked YES to question 2 above, then answer Question No. 3. If you checked NO to**
2 **question 2 above, you are not to answer further Questions.**

3

4 3. Has the Plaintiff proven by a preponderance of the evidence that Defendant terminated
5 Plaintiff because she was engaged in protected activity?

6 yes

7 no

8 **If you checked YES to question 3 above, then answer Question No. 4. If you checked NO to**
9 **question 3 above, you are not to answer further Questions.**

10 4. Has the Defendant proven by a preponderance of the evidence that its decision to
11 terminate Plaintiff was also motivated by a lawful reason?

12 yes

13 no

14

15 **If you checked YES to question 4 above, then answer Question No. 5. If you checked NO to**
16 **question 4 above, you are not to answer further Questions.**

17

18 If you answered no to question #4, what is your award of damages to the Plaintiff? \$_____
19 against Defendant.

20 5. Did Plaintiff prove by a preponderance of the evidence that Defendant's reasons for
21 termination were pretextual?

22 yes

23 no

24 If you answered yes to question #5, what is your award of damages to the Plaintiff?
25 \$____ against Defendant.

26 _____
27 Foreperson

1
2 Plaintiff's position: Plaintiff does not stipulate to use of this Verdict Form.
3
4

5 DATED this 17th day of February, 2015.
6
7

8 Respectfully submitted,
9

10 POLSINELLI PC
11

12 /s/ Sean R. Gallagher
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Harrison Medical Center
24
25
26
27

CERTIFICATE OF SERVICE

I, Holly Holman, certify under penalty of perjury under the laws of the United States that, on February 17, 2015, I served the attached document to the party listed below in the manner shown next to his/her name:

ATTORNEY FOR PLAINTIFF:

Robert Fulton, WSBA No. 29277 [X] By United States Mail
601 Union St., Suite 4200 [] By Legal Messenger
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/s/ Holly Holman
Holly Holman